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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

RICHARD ALEXANDER, individually,
and on behalf of the ESTATE OF
SANDRA L. CAREY,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 2:22-cv-01324-KJM-CKD

**STIPULATION AND ORDER FOR
MODIFYING SCHEDULING ORDER (ECF 9)**

STIPULATION AND ORDER

IT IS HEREBY STIPULATED, by and between the parties and subject to Court approval, that (1) the deposition of the non-retained expert witness Gurinder J. Singh, M.D., may occur on January 10, 2024, after the current expert-discovery cutoff December 15, 2023, and (2) the deadline to file dispositive motions shall be continued commensurately from December 29, 2023, to January 26, 2024. See ECF 9. The reasons for this stipulation are as follows.

The parties have acted with diligence to complete fact and expert discovery, and to date they have not sought any modifications to the Court's Scheduling Order. One of the non-retained expert witnesses in this case, however, has had repeated health issues that have resulted in the cancellation of two previously scheduled depositions. The parties respectfully submit there is good cause to modify the scheduling order in light of the unanticipated delay in completing this witness's deposition.

Dated: December 1, 2023

BERTLING LAW GROUP

/s/ Peter G. Bertling (authorized 12/1/2023)
PETER G. BERTLING

Attorneys for Plaintiffs

Dated: December 3, 2023

PHILLIP A. TALBERT
United States Attorney

By: /s/ Joseph B. Frueh
JOSEPH B. FRUEH
Assistant United States Attorney

Attorneys for Defendant

IT IS SO ORDERED

Dated: December 5, 2023.


CHIEF UNITED STATES DISTRICT JUDGE